

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PATRICK HENRY MURPHY, JR.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION
	§	NO. 4:19-cv-1106
BRYAN COLLIER, Executive	§	
Director of the Texas	§	
Department of Criminal Justice;	§	
LORIE DAVIS, Director of the	§	
Texas Department of Criminal	§	
Justice - Correctional	§	
Institutions Division; and	§	
BILLY LEWIS, Warden of the	§	
Huntsville Unit,	§	
	§	
Defendants.	§	

ORAL DEPOSITION OF
TIMOTHY CLYDE JONES
JUNE 24, 2019

ORAL DEPOSITION of TIMOTHY CLYDE JONES, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on June 24, 2019, from 10:13 a.m. to 11:06 a.m., before Kerrienne L. Bond, CSR in and for the State of Texas, reported by machine shorthand, in the boardroom of the Huntsville Public Library, 1219 13th Street, Huntsville, Texas, pursuant to the Federal Rules of Civil Procedure and stipulations of counsel as set out herein or attached hereto.

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1 TIMOTHY CLYDE JONES,
2 having been first duly sworn, testified as follows:

3 E X A M I N A T I O N

4 BY MR. NEWBERRY:

5 Q. As I said earlier, I'm Jeff Newberry. I'm an
6 attorney who represents Patrick Murphy.

7 A. Yes, sir.

8 Q. I appreciate you coming out here for this
9 deposition today.

10 For the record, can you state your full
11 name?

12 A. Timothy Clyde Jones.

13 Q. And, Mr. Jones, what's your current position
14 with TDCJ?

15 A. Current official title is Manager IV, deputy
16 director of religious services.

17 Q. Okay. And what do you do as the deputy
18 director of religious services?

19 A. Oversee all chaplaincy operations.

20 Q. Okay. I've got here an organizational chart
21 that I pulled off the TDCJ website. I told your
22 attorneys today that every exhibit I'd use would be
23 something that I got from them. That's true except for
24 this one. I'm going to go ahead and mark it Exhibit 1.

25 (Marked Jones Exhibit No. 1.)

1 Q. (BY MR. NEWBERRY) Some of the organizational
2 charts that I can access online -- I'm going to go ahead
3 and show it to you. I've got a copy there for your
4 attorneys.

5 Some of the organizational charts that I'm
6 able to access online have names associated with them.
7 I couldn't find one for the Rehabilitation Programs
8 Division, so I was just hoping you could help me figure
9 out where you fit in here. Are you the deputy division
10 director or --

11 A. No, sir. This is an old chart.

12 Q. Oh, okay.

13 A. This is not up to date.

14 Q. Well, then, who is your -- so as the -- and it
15 was director in charge of chaplains?

16 A. Uh-huh.

17 Q. Okay. Who would be your supervisor?

18 A. I report to the deputy director -- deputy
19 division director.

20 Q. Okay. And what is the name of that person?

21 A. Christopher Carter.

22 Q. Okay. And then would Mr. Carter report to the
23 Rehabilitation Programs Division director?

24 A. Mr. Hinojosa, yes, sir.

25 Q. Is that Rene Hinojosa?

1 A. Yes, sir.

2 Q. And then Mr. Hinojosa would report directly to
3 Bryan Collier?

4 A. I believe so.

5 Q. Okay. So you -- okay. That's fine.

6 Can you tell me if the chaplaincy
7 department -- is that within the Correctional
8 Institutions Division or is it in a separate division of
9 TDCJ hierarchy?

10 A. It's in the Rehabilitation Programs Division.

11 Q. Okay. And so you would not be -- so Ms. Lorie
12 Davis, the Correctional Institutions Division director,
13 she would not be somebody who is in your line of
14 hierarchy within the TDCJ structure. Is that correct?

15 A. Correct.

16 Q. Okay. I appreciate your looking at that
17 exhibit with me. That's all that I wanted to kind of
18 get clear with the structure there.

19 Now, you first began with TDCJ July 12th,
20 2012. Is that correct?

21 A. Yes, sir.

22 Q. And what was your original position then?

23 A. I was a correctional officer.

24 Q. Okay. When then did you enter into the
25 chaplaincy division?

1 A. February of 2013.

2 Q. Okay. And when you worked as a correctional
3 officer, what unit or units did you work at?

4 A. I was at the Wynne Unit.

5 Q. The Wynne Unit?

6 A. Yes, sir.

7 Q. And that was the only unit you worked at as a
8 correctional officer before you made the transition to
9 the chaplaincy program?

10 A. Correct.

11 Q. And then when you began as a chaplain in
12 February of 2013, were you assigned to a particular
13 unit?

14 A. Yes.

15 Q. What unit was that?

16 A. Polunsky.

17 Q. And I've been given some job descriptions for
18 positions within the chaplaincy department. Would you
19 have been classified as a Chaplain I, a Chaplain II, or
20 a Chaplain III at that point?

21 A. Started as a Chaplain I and moved to a
22 Chaplain II.

23 Q. And so February 2013 at the Polunsky Unit, you
24 were a Chaplain I?

25 A. Correct.

1 **Q. When did you move to Chaplain II,**
2 **approximately?**

3 A. Specific date, I couldn't give you. Probably
4 about a year, 13, 14 months from the time I came on.

5 **Q. Okay. So approximately April to May of 2014?**

6 A. Correct.

7 **Q. Just continuing on this line of questions,**
8 **then, after you were a Chaplain II, then did you become**
9 **a Chaplain III after that, or was it straight to the**
10 **position that you are now or --**

11 A. No. I left -- I was at two separate units and
12 then promoted from my last unit to the assistant
13 director chaplaincy, which is a Chaplain III.

14 **Q. Okay. And so when did you leave the Polunsky**
15 **unit?**

16 A. I was there four years. '17, I believe it
17 was.

18 **Q. Early 2017?**

19 A. The latter part of -- it was either December
20 of '16 -- I left December of '16, but my official start
21 date at the Huntsville Unit was 2017.

22 **Q. And that was the Huntsville Unit?**

23 A. Correct.

24 **Q. When you were first hired on -- well, not when**
25 **you were first on, because you were first hired on as a**

1 correctional officer. But when you first made the
2 transition to Chaplain I in February of 2013 --

3 A. Yes, sir.

4 Q. -- did you interview with someone for that?

5 A. Yes, sir.

6 Q. Do you remember the name of that person?

7 A. Yes. Vance Drum.

8 Q. In your current position -- and I think I have
9 a job description for your current position, but are you
10 involved at all in hiring new chaplains? Is that
11 something that you do?

12 A. I am involved in it, yes, sir.

13 Q. Okay. So you're familiar with the job
14 descriptions for the various jobs within the chaplaincy
15 department?

16 A. I believe so.

17 Q. Okay. I'm going to go ahead and mark what's
18 been given to me, described as the TDCJ -- excuse me --
19 TDCJ Chaplain I job description. I'm going to mark that
20 as Exhibit 2.

21 (Marked Jones Exhibit No. 2.)

22 Q. (BY MR. NEWBERRY) I'll hand that to you,
23 Mr. Jones, with a copy for your attorney.

24 MS. O'LEARY: Thank you.

25 MR. NEWBERRY: You're welcome.

1 Q. (BY MR. NEWBERRY) You can look it over and
2 tell me: Does this look like the current job
3 description for the Chaplain I job position?

4 A. It does.

5 Q. Okay. I'm looking at the -- actually, the
6 first page of the job description. Not the affidavit,
7 but the page that's marked Murphy 791 in the bottom
8 right-hand corner. Underneath Part IIA, it says that --
9 can you -- can you tell me, under IIA, what it
10 describes, the description of this Chaplain I position
11 in that one paragraph?

12 A. Sure. "Plans, schedules, and conducts
13 religious education worship services, programs, and
14 sacramental ministry in accordance with the practices
15 and customs of the chaplain's faith and according to
16 offender faith group representation; conducts regular
17 visits to offenders, administrative segregation housing
18 areas, and individuals who are critically ill; and
19 counsels offenders on religious problems, personal
20 issues, crisis intervention, grief, and institutional
21 adjustment."

22 Q. And when it says that this person provides
23 these services in accordance with the practices and
24 customs of their faith --

25 A. Uh-huh.

1 Q. -- what does that mean?

2 A. For instance, I'm not Roman Catholic, so I
3 couldn't do the sacraments. I couldn't fill in for the
4 priest and do the sacraments for that -- that faith,
5 according to -- in other words, I wouldn't do it for
6 Neopagans or -- I'm not equipped to do it, is a better
7 word --

8 Q. Okay.

9 A. -- to do it for them, as well. So I can only
10 practice within what my belief system is.

11 Q. And so if the individual chaplain's belief
12 system dictates what they can do as a chaplain, is that
13 something that comes up in the interview process when
14 you're hiring a new chaplain, what their faith is?

15 A. No, sir.

16 Q. Then at what point do you ask them what their
17 faith is?

18 A. Never.

19 Q. So then how do you know who can perform
20 certain rites and who cannot? Because you said you
21 could not --

22 A. Usually, it's on their application.

23 Q. Okay. So it is information that is provided
24 to you, even if it's not something you ask for?

25 A. Correct.

1 Q. Okay. When you're making decisions on who to
2 hire as chaplain, do you take that into consideration?

3 A. We look at the one that's best qualified for
4 the job, no matter what their faith is.

5 Q. But does the need to have a certain person who
6 is qualified to perform -- let's just use an example of
7 the Catholic Communion or the sacred rites there -- does
8 that -- the need for that, does that factor in at all
9 into the hiring decision?

10 A. It doesn't on mine. I pick the best available
11 candidate.

12 Q. Okay. But you are limited to what you can do,
13 based on what your faith is?

14 A. Correct.

15 Q. And the same would be true of other chaplains
16 in the department?

17 A. Correct.

18 Q. Okay. So I know you said you don't ask about
19 it during the hiring process, but it is information
20 that's provided to you. Do you know if there are any
21 chaplains employed that are Buddhist, currently?

22 A. Not that I'm aware of.

23 Q. Is there -- are there records maintained that
24 list the various faiths of all the chaplains that are
25 employed?

1 A. You would have to check with human resources.

2 I don't have those.

3 Q. Is there a human resources office within the
4 chaplaincy department, or is it the broader TDCJ human
5 resources?

6 A. Broader.

7 Q. Do you happen to know the name of the person
8 that might have those records?

9 A. Not off the top of my head, no, sir.

10 Q. Okay. Is there anyone else involved in hiring
11 chaplains within your department, or is that something
12 you do by yourself?

13 A. Usually, it's myself and the assistant
14 director.

15 Q. Okay. And is that Mr. Carter?

16 A. Brouwer.

17 Q. Oh, Brouwer. Okay. Are you at all involved
18 in hiring or supervising the Muslim area chaplains?

19 A. Yes.

20 Q. Do you know why that one particular religion
21 was singled out as needing chaplains of that particular
22 faith?

23 A. No, sir. That was done before I ever came in
24 the agency.

25 Q. Are there currently five Muslim area

1 **chaplains? Is that correct?**

2 A. Correct. Well, currently, there are four.

3 **Q. There are four?**

4 A. We have one that's retired, so there's an open
5 position.

6 **Q. And is it correct that even though their title**
7 **is area chaplain, that they actually go and they provide**
8 **services on the individual units, these four Muslim area**
9 **chaplains?**

10 A. Their job is to help out on those units that
11 need -- they're the -- they're the go-to person for that
12 faith in that region.

13 **Q. Okay. Are you involved at all in contracting**
14 **with Native American chaplains?**

15 A. I haven't been, but that does fall under my
16 purview.

17 **Q. Is there currently a Native American chaplain**
18 **that TDCJ has a contractual relationship with?**

19 A. Currently, we have two.

20 **Q. Two. Okay. How long have these individuals**
21 **worked for you?**

22 A. That, I couldn't -- don't have the numbers.

23 **Q. Do you know their names, these two Native**
24 **American chaplains?**

25 A. Not their official names, no. I know one's

1 name is Raul. That's the only thing I know him by.

2 **Q. Okay.**

3 A. And the other one is female, who is retiring
4 in September. She's not going to renew her contract.
5 And her name is Shawna Mitchell.

6 **Q. So for Raul and Shawna Mitchell, is there a**
7 **set number of hours per period that they work for TDCJ?**
8 **What's the time commitment that they make in their**
9 **contract with you? Is that determined by the contract?**

10 A. I'm not -- I'm not sure if there's a time
11 commitment, but visits. They get paid per visit, and
12 they're only allowed so many a month.

13 **Q. How many visits are they allowed a month?**

14 A. That, I don't have. I know the contract, I
15 believe, says at least one a month, so -- that's for
16 different facilities, though.

17 **Q. Okay. And I know you don't know how many**
18 **visits they're allowed per month. Do you know**
19 **approximately how many visits they conduct each month**
20 **for Raul and Shawna?**

21 A. Not off the top of my head. I couldn't give
22 you the exact number.

23 **Q. I want to ask you similar questions for Jewish**
24 **chaplains. Have you been involved in contracting with**
25 **any Jewish chaplains that currently work for TDCJ?**

1 A. I have not, as yet.

2 Q. And have you been involved in contracting with
3 any Jewish chaplains that work with TDCJ in the past but
4 don't currently work with TDCJ?

5 A. No, sir.

6 Q. Are there currently any Jewish chaplains that
7 work for TDCJ on a contract basis?

8 A. Not that I'm aware of, Jewish. We have
9 Messianic Jews, but we don't have Jewish.

10 Q. So there are Messianic Jewish chaplains that
11 you enter into contractual agreements --

12 A. Not contract. They're hired.

13 Q. Okay. And they would just be Chaplain I?

14 A. Yes.

15 Q. Okay. And I apologize for not knowing this.

16 Can you tell me what the difference is between a
17 Messianic Jew and a Jewish person?

18 A. Jewish Orthodox Messianic believe in Christ as
19 the -- as the Messiah, and Jewish do not.

20 Q. And, again, pardon my ignorance on that.
21 Would a Messianic Jewish person -- would that be someone
22 who is considered a Christian, then, if they believe in
23 Christ?

24 A. Some call themselves that.

25 Q. Let me ask -- I'm going to ask you about that,

1 then. Well, first of all, before we close off this
2 topic of contracts, are there any other chaplains right
3 now that TDCJ has engaged in a contractual arrangement
4 with besides Shawna and Raul, the Native American
5 chaplains?

6 A. Specifically for Native American, you're
7 speaking of, or --

8 Q. No. For any other groups.

9 A. We do have a Jewish contract chaplain.

10 Q. Okay. And what is that person's name?

11 A. Rabbi Goldstein.

12 Q. And were you involved in entering into the
13 contract that Rabbi Goldstein works under?

14 A. Not as of yet.

15 Q. Is his arrangement similar to the Native
16 American chaplains, where he gets paid per visit?

17 A. I haven't seen his contract, but I would think
18 it would be close to that.

19 Q. Okay. So besides this one rabbi and these two
20 native American chaplains, are there any other chaplains
21 that TDCJ currently has a contractual agreement with?

22 A. Not that I'm aware of.

23 Q. Would you expect Rabbi Goldstein to minister
24 to anyone who is not a Jew?

25 A. No, sir.

1 Q. Would he be acting outside of the terms of his
2 contract if he did that?

3 A. Again, without seeing his contract, I don't
4 know.

5 Q. Okay. Same question with the two Native
6 American chaplains. Would you expect either of them to
7 visit or otherwise minister to a
8 non-Native-American-religion-practicing inmate?

9 A. There again, I don't know -- I know we have
10 offenders that will go to maybe a Native American
11 service to see what it's like, and they may talk to that
12 extent. But I don't know that they travel the unit to
13 visit them.

14 Q. You mentioned a couple of minutes ago that
15 there is, I believe, one chaplain who is a Messianic Jew
16 currently employed as a chaplain at TDCJ. Is that
17 correct?

18 A. One that I know of.

19 Q. One that you know of. Okay. And, again, I
20 know you said this isn't information that you look at
21 when you're hiring, but do you know of any other persons
22 who are employed as chaplains that don't identify as
23 Christians besides this one Messianic Jew?

24 A. We have Catholic chaplains, but off the top of
25 my head, no, sir, I don't know.

1 Q. Okay. I'm going to shift and talk about your
2 involvement in -- during executions.

3 A. Yes, sir.

4 Q. I believe you first aided in the execution
5 chamber on November 12th, 2013. Is that correct?

6 A. Correct.

7 Q. Okay. And I've got here a chart with 66 rows
8 on it that I'm going to mark as Exhibit 3.

9 (Marked Jones Exhibit No. 3.)

10 Q. (BY MR. NEWBERRY) I'm going to hand that to
11 you, Mr. Jones, and a copy for your attorney.

12 Is this a table that you provided to your
13 attorney in preparation for this deposition?

14 A. Yes, sir, it looks like it.

15 Q. Okay. Are these from your own personal
16 records?

17 A. Yes, sir.

18 Q. So you keep up with your involvement in each
19 execution?

20 A. (Nodding head up and down).

21 Q. Do you know if there's any TDCJ process or
22 office that also keeps up with this information?

23 A. Not that I'm aware of.

24 Q. So as far as you know, you would be the only
25 source of information regarding the executions that

1 you've participated in? In other words, no one could
2 get this information from anyone but you?

3 A. No, sir. There is a form that is sent out
4 every execution that shows who's coming from the CID
5 side, who's going to be witnessing from the offender's
6 side, the victim's side, and then there's a list that
7 shows the chaplains that are with the family and then
8 the chaplains that are with the offender. So -- but it
9 doesn't designate who's in the chamber.

10 Q. Okay. But it does have -- so it designates
11 who's going to be with the offender and who's going to
12 be with the family?

13 A. Correct.

14 Q. Okay. And it excludes the person that's in
15 the chamber, or it just doesn't specify which one?

16 A. Doesn't specify which one.

17 Q. But that person's name would be contained on
18 this form?

19 A. Should be, yes, sir.

20 Q. Okay. Does this form have a particular
21 number? I know that, you know, some forms have an
22 identifying number like -- I'm familiar with I-60s.

23 A. No, sir.

24 Q. Okay.

25 A. No, sir, not that I'm aware of.

1 Q. Okay. Do you believe these forms are kept
2 after an execution?

3 A. That, I don't know.

4 Q. Do you have any idea, if they were kept, who
5 might be responsible for keeping up with them?

6 A. Unless it would be the Huntsville Unit itself,
7 I don't know.

8 Q. Okay. So if it is the Huntsville Unit, in
9 that scenario, would you think it would be the
10 Huntsville Unit chaplain or someone else there?

11 A. No, sir, not the chaplain.

12 Q. Okay. Now, looking at this list, I know that
13 the -- well, first of all, looking at the third column,
14 you have, I believe, three different designations:

15 WSL --

16 A. Uh-huh.

17 Q. -- DH and DC.

18 A. Yes, sir.

19 Q. Can you explain what each one of these means?

20 A. Yes, sir. WSL stands for witness support
21 liaison. That's usually the designation when you're
22 with the family, when your -- your assignment is to be
23 with the offender's family during that time. The DH is
24 when you're in the death house, is the abbreviation of
25 what they called it, and that's the holding area.

1 Q. And then DC is death chamber?

2 A. Correct.

3 Q. Okay. So for these rows marked WSL or witness
4 support liaison --

5 A. Yes, sir.

6 Q. -- would you have any contact with the inmate
7 at all when you're assigned as a witness support
8 liaison?

9 A. Yes. According to my sheet, if you look,
10 No. 24, I was back in the holding area, but then I also
11 went over to the other side, the witness support
12 section, to bring the family over. I didn't do it all
13 the time, but when we were short or didn't have somebody
14 to cover it, we did that.

15 Q. But, say, Rows 1 through 9, where it's --
16 you've only marked WSL and it's not also DH --

17 A. Correct.

18 Q. -- does that mean in those instances you did
19 not have any contact with the inmate?

20 A. Only through the viewing -- through the
21 window, but no physical or verbal.

22 Q. And that would have been from the -- his
23 family's viewing room?

24 A. Correct.

25 Q. Okay. So then according to this chart, am I

1 correct that the first inmate who was executed that you
2 had contact with, then, on the day of his execution was
3 Robert Garza?

4 A. That would be correct.

5 Q. Okay. And I notice -- and that's Row 10. Is
6 that correct?

7 A. Yes.

8 Q. For Mr. Garza, there's a notation in the
9 fourth column that says "baptized."

10 A. Yes, sir.

11 Q. Can you tell me what that means on this table?

12 A. Yeah. That was just for my personal use. He
13 asked me to baptize him before his execution. So the
14 day before, that's what -- I was called in and baptized
15 him before the execution.

16 Q. And that happened the day before?

17 A. Correct.

18 Q. So that would have been at the Polunsky unit?

19 A. Correct.

20 Q. Okay. And that's going to be true for
21 everyone that you've made the notation of "baptized" in
22 the fourth column?

23 A. Yes, sir.

24 Q. And for all these individuals, it would have
25 happened the day before?

1 A. Correct.

2 Q. Okay. Would that have been somewhere in
3 Building 12 there at the Polunsky unit?

4 A. Yes, sir.

5 Q. Okay. And I take it these offenders, then,
6 all identified as Christians?

7 A. I didn't ask them. They just asked me to
8 baptize them, and I baptized them the way that I
9 normally would baptize somebody in the free world.

10 Q. And what way is that?

11 A. Submersion.

12 Q. Okay. Consistent with the Christian practice
13 of baptism?

14 A. I would say, yes, sir.

15 Q. Okay. So I want to ask you about these
16 inmates where you indicated that you worked in the death
17 house. So like Robert Garza on Row 10, Arturo Diaz on
18 Row 11, if these inmates asked you to pray with them
19 there at the death house, would you do that?

20 A. If they requested me to and I could, yes.

21 Q. And under what circumstances would you not be
22 able to?

23 A. I could only pray according to my faith and my
24 belief. If they have something that's different -- for
25 instance, Buddhists, I don't know their chants. I don't

1 know what they say, so I couldn't offer them any
2 prayers. I take that back. I could offer them prayers,
3 but it wouldn't be the way they wanted it.

4 Q. Okay. And I know in your answer just now, you
5 said that you wouldn't know their chants. If they told
6 you what the chant was, would you be able to chant with
7 them?

8 A. I don't think that would be fair to them.

9 Q. Why is that?

10 A. Because it wouldn't be something that I
11 believe or something that I would practice. So I don't
12 know that I could do it.

13 Q. Anytime that you've worked in the death
14 house -- and you don't have to specify inmates if you
15 don't want to -- do you remember any times when you
16 discussed scriptures with any of these inmates?

17 A. Unless they brought it up, no, sir.

18 Q. Okay. But do you remember any instances where
19 they did bring it up and then you did discuss scriptures
20 with them?

21 A. The only one I can remember was Willie
22 Trottie, No. 22.

23 Q. And Mr. Trottie was executed on
24 September 10th?

25 A. Correct.

1 Q. And can you tell me the types of scripture
2 that Mr. Trottie asked you to share with him?

3 A. I couldn't give you the scriptures that I
4 gave, because I'm not sure. They were -- one of them
5 was on peace. I know that. He asked me about the 23rd
6 Psalm, asked me if I knew it. And I said, "Yeah," and
7 he quoted it to me.

8 Q. And the 23rd Psalm is in the Christian Bible?

9 A. It's "The Lord is my shepherd."

10 Q. Right. Which, again, though is -- and I'm
11 familiar with the Psalm, but just to clarify that, that
12 is a Psalm that is contained within the Christian Bible?

13 A. It's contained in the Bible.

14 Q. Okay, yeah. And the passage about peace would
15 have also been contained in the Bible?

16 A. Yes.

17 Q. Okay. For Mr. Trottie, you also worked in the
18 death chamber. Did you have any interactions with him,
19 that you remember, when you were inside the death
20 chamber?

21 A. No, sir.

22 Q. I'll get back to the death chamber in just a
23 minute. I want to talk a little bit more about your
24 role in the death house.

25 When you work in the death house, how many

1 other chaplains are in that area?

2 A. We have a team of three, two to three at
3 least.

4 Q. Okay. And who selects who works in the death
5 house? Is that a decision you would now make in your
6 current position, or --

7 A. It's -- well, the assistant director is the
8 one who oversees the execution process. That falls
9 under his level.

10 Q. And that's Mr. Brouwer?

11 A. Correct.

12 Q. Okay. And so Mr. Brouwer makes the decisions
13 about who's going to be in the death house?

14 A. He hasn't currently, because he's fairly new
15 at the job. So I've still been carrying that role.

16 Q. Okay. And I know I said I was going to wait
17 till later, but who makes that decision, with respect to
18 the death chamber?

19 A. We rotate.

20 Q. Okay. Rotate among who?

21 A. Among Chaplain Brouwer, myself, and Chaplain
22 Moss.

23 Q. Okay. And when you say "rotate," you rotate
24 in who makes the decision, or you rotate among the three
25 of you in actually being the person in the execution

1 **chamber?**

2 A. The plan is to rotate among the three of us,
3 that I may do the first one; the next one, Chaplain
4 Brouwer would do; the next one, Chaplain Moss would do.
5 And we would just keep the rotation.

6 However, if -- if I'm in there with one of
7 the gentlemen or in the death house with one of the
8 gentlemen and he and I don't seem to be connecting, then
9 I would step back and let somebody else step up, see if
10 they can make a connection. The whole -- our whole job
11 is to keep them relaxed. So it's talking about
12 football, talking about family, where they're from,
13 those type things.

14 **Q. So when you say "make a connection," that's**
15 **not necessarily on a spiritual level?**

16 A. No, sir.

17 **Q. You could just be chatting about football?**

18 A. Could be anything.

19 **Q. Okay. But you want the person who is in the**
20 **execution chamber, if possible, to be someone that there**
21 **is some kind of connection with?**

22 A. That was our goal when we were in there, yes,
23 sir.

24 **Q. Okay. Would there ever be a circumstance that**
25 **would cause you to deviate from that plan of rotating**

1 among the three of you?

2 A. Not that I'm aware of.

3 Q. So in the time that you've been a part of this
4 group, it's always been one of the three of you?

5 A. Well, there was one or two others who are no
6 longer in that role that don't do that anymore.

7 Q. Okay. And so, once again, just so I can get a
8 complete list, since you started working in the
9 execution chamber, can you tell me the names, again, of
10 all the chaplains that you know of who have worked in
11 the execution chamber?

12 A. Would be Michael Rutledge -- Dr. Rutledge --
13 David Collier. I think Dan Rose did one.

14 Q. Is that "Rose" or --

15 A. R-O-S-E, "Rose," like the flower.

16 Q. Okay.

17 A. And then myself, Brouwer, and Moss.

18 Q. Okay. And does Dr. Rutledge -- is he employed
19 by TDCJ?

20 A. He is.

21 Q. What is his position?

22 A. He was the director of chaplaincy, and now he
23 is -- was the assistant director, then became director,
24 and now he is over evidence-based practice.

25 Q. Okay. And then what about Dan Rose?

1 A. He was a regional chaplain. He's retired.

2 Q. Okay. Regional chaplain, is that the same as
3 Chaplain III or --

4 A. Chaplain III, yes.

5 Q. Okay. I believe I know the answer to this,
6 but just to clarify: If a Muslim inmate was to be
7 executed and he asked you in the execution chamber to
8 recite the Islamic declaration of faith with him, is
9 that something you'd be able to do?

10 A. In the death chamber, no.

11 Q. How about -- if I said "death chamber," I
12 misspoke. I meant in the death house. Would you be
13 able to do that in the death house?

14 A. No, sir, because I don't know it.

15 Q. If he was able to provide you material from
16 his property there in the death house, would that be
17 something you'd be able to say with him?

18 A. I could say it. I wouldn't necessarily
19 believe it. But if it would relax him and make him
20 calmer, as long as I don't have to make a profession,
21 then I could do that.

22 Q. But if the declaration of faith that he wanted
23 you to say with him was that there is one God, who is
24 Allah, is that then a declaration you could say with
25 him?

1 A. Probably not.

2 Q. I've just got one final area of questions that
3 I want to discuss with you, Mr. Jones.

4 During any time that you've worked either
5 in the death house or the death chamber, have you ever
6 known any clerical person to assault any other person
7 during an execution?

8 A. Not that I'm aware of.

9 Q. And for purposes of these questions, when I
10 say "clerical person," I mean someone working for TDCJ
11 or a spiritual advisor there for the inmate.

12 Have you ever seen such a person attempt
13 to gain access to the drug team?

14 A. No, sir.

15 Q. Have you ever seen such a person taunt the
16 victim's family?

17 A. Either a spiritual advisor or a chaplain?

18 Q. Yes.

19 A. No.

20 Q. And have you ever seen a spiritual advisor for
21 an inmate or a TDCJ chaplain attempt to remove the
22 intravenous lines from the person who is to be executed?

23 A. No.

24 Q. Okay. The first time that you worked in the
25 death chamber -- and I apologize for having to move

1 back -- was Jamie McCaskey on November 12th, 2013,

2 Line 13. Is that --

3 A. Yes, sir.

4 Q. Okay. Before you worked in the execution
5 chamber, did you receive any kind of special training?

6 A. Just being walked through, showing what we do.
7 Had to view -- because if you'll notice, there was three
8 prior to that, that I had to watch to see how the
9 protocol was to make sure I knew the steps that we were
10 supposed to take, what was happening, what was the next
11 step, what was the next step. So --

12 Q. And that was -- I'm sorry to interrupt you.
13 Go ahead.

14 A. No, you're fine.

15 Q. Okay. So that was something that happened
16 before you worked in the death house at all?

17 A. Correct.

18 Q. And so it was a process you were familiar with
19 before you worked in the death chamber?

20 A. Correct.

21 Q. Was that -- who went through those steps with
22 you?

23 A. At the time, it would have been David Collier,
24 who was the Huntsville Unit chaplain, and Dr. Rutledge.

25 Q. Is that something that still happens before a

1 chaplain works in the death house or the death chamber
2 for the first time?

3 A. Correct.

4 Q. And who is the person now that would walk them
5 through that?

6 A. Myself.

7 Q. Okay. Would that person have any interaction,
8 as far as training, from Ms. Davis or whoever the
9 Correctional Institutions Division director is at that
10 time?

11 A. Other than sitting down and speaking with the
12 warden and going over things with the warden on the
13 unit, no.

14 Q. So besides yourself, that person would only
15 have instruction from the Huntsville Unit warden?

16 A. I'm not -- I don't know that it would be
17 instruction, but they may talk to them about what's
18 going to take place. Most of the instruction would come
19 from us, because we only deal with a certain part of it.
20 We don't deal with the whole thing. So we have very
21 specific...

22 Q. And I know currently the rotation is -- it's
23 really, I guess, position-based as to who's going to
24 work in the execution chamber -- is that right? --
25 whoever has one of these three positions?

1 A. No, sir. Currently, we're not doing any
2 anymore.

3 **Q. That's correct. I'm sorry.**

4 Just prior to the April 2nd amendment to
5 the execution procedures, am I correct in characterizing
6 the nature of deciding who would be in the execution
7 chamber is based on that person's position?

8 A. No, sir. It would be on the rotation schedule
9 that we would set up.

10 **Q. Uh-huh. And so the rotation schedule -- and I**
11 **know you told me the three people that were on it --**
12 **that's not dictated by the position those people hold?**

13 A. No, sir. If that was the case, I'd be in
14 every one of them, if we were going by position.
15 It's -- we rotate it just so we -- we three know what to
16 do. We three have been through the process. We've been
17 through the training. And we rotate it so one person
18 doesn't have to do all of them.

19 **Q. And I apologize if I've covered this. Who**
20 **makes the decision as to who's going to be in that**
21 **group?**

22 A. That would -- I guess would be through me.

23 **Q. Okay. And besides going through the different**
24 **procedures that you had to go through before, I believe,**
25 **Robert Garza's execution, is there any other additional**

1 training this person would receive?

2 A. No, sir.

3 Q. And is there any attempt to delve into that
4 person's past to find out if they're somebody who can be
5 trusted in this tense situation?

6 A. We look at -- first of all, this is a
7 voluntary position. They don't get paid extra for doing
8 this. So it's if they want to volunteer. The other
9 thing is we look at their work history, have they been
10 in -- had any disciplinaries while working for TDCJ;
11 their conduct; how long they get along with the unit
12 staff; how well they get along with offenders. We look
13 at their professionalism all over.

14 Q. Is there a minimum amount of time that someone
15 would have had to work for TDCJ before that person could
16 be considered to be eligible to work in the execution
17 chamber?

18 A. I don't know that there's a minimum amount of
19 time.

20 Q. Are you familiar with the first time that
21 David Collier worked in the execution chamber?

22 A. No, sir. I wasn't with the agency then.

23 Q. Okay.

24 MR. NEWBERRY: Well, thank you,
25 Mr. Jones. I know I kind of jumped back there, but I am

1 now finished asking questions. I'll go ahead and pass
2 to Ms. O'Leary.

3 MS. O'LEARY: Do you mind if we take just
4 a five-minute break?

5 (Break from 10:54 a.m. to 11:01 a.m.)

6 E X A M I N A T I O N

7 BY MS. O'LEARY:

8 Q. Okay, Chaplain Jones. I want to refer back to
9 what has been previously marked for this deposition as
10 Exhibit 2, and that is the Chaplain I job description.
11 And you previously testified about Section IIA, which is
12 on Page Murphy 791 of that document.

13 A. Uh-huh.

14 Q. And you were asked about providing ministry as
15 to the chaplain's personal faith. Do you recall that
16 testimony?

17 A. I do.

18 Q. Okay. What I want to ask you is: Aside from
19 providing some type of ministry specific to the
20 chaplain's personal faith, does the chaplain have some
21 other roles that are not specific to his faith?

22 A. Yes, ma'am. As a chaplain, we are to be
23 ecumenical in our -- in our practice, which means I may
24 not have that faith, but we can -- we are supposed to
25 facilitate for every faith group that we have. We're

1 supposed to facilitate -- which, if I can't do it, my
2 job is find a volunteer or somebody on the outside who
3 can come in and do services for them.

4 Q. And in performing -- is that a role that you
5 have performed in the past?

6 A. Yes, ma'am.

7 Q. In performing that role, have you ever done
8 any research or looked up information about a faith that
9 was not your own so that you could help facilitate that?

10 A. I have.

11 Q. You previously testified that you would be
12 unable to recite, for example, a Muslim prayer that
13 required you to profess something. Do you recall that
14 testimony?

15 A. I do.

16 Q. Okay. So in a situation -- and we can use the
17 death house as an example for context. In the death
18 house, if an offender who was not of your personal
19 faith -- for example, a Muslim or Buddhist offender --
20 asked you if you would pray with him and he wanted to
21 recite either his Buddhist or Muslim prayer, what would
22 you do that in situation?

23 A. Again, because I don't know the prayer, I
24 couldn't recite it with him, but I would stand outside
25 his holding area and I would bow my head in respect for

1 his faith. So whatever he wants to say or whatever he
2 wants to chant, I'm not going to stop him and say, "No,
3 I can't do it." I'll just be respectful of his faith.

4 Q. Okay. So you wouldn't walk away or say "I
5 can't participate in that." You just -- you wouldn't
6 necessarily say it with him?

7 A. Correct.

8 Q. Okay. And just to clarify for the record,
9 there were some questions earlier about the chaplain's
10 role or the selection of chaplains to be present in the
11 execution chamber, and when you answered those
12 questions, were you specifically talking about before
13 the policy changed in April?

14 A. Correct.

15 Q. Okay. So just to make sure it's clear,
16 currently, and since the April change in the policy,
17 chaplains do not go into the execution chamber?

18 A. That's correct.

19 Q. Okay. You testified previously in response to
20 some questions about training and how you train or how
21 you were trained to participate in execution procedures.
22 Have you received any training on security?

23 A. Yes -- yes, ma'am. Every -- every chaplain
24 that's hired by the State has to go through six weeks of
25 the academy pre-service. They go through security, how

1 do to shakedowns, how to do -- everything a security
2 officer does, we go through that.

3 Q. Okay. And do you receive any kind of updated
4 training through the years of your employment?

5 A. Every year.

6 Q. Okay. And you testified that you actually
7 started as a CO, correct?

8 A. Correct.

9 Q. Okay. So does that mean that you received
10 more security training because you started as a CO, or
11 was it the same security training in the beginning as a
12 chaplain would receive?

13 A. It's the same. The only difference would be
14 as a chaplain, you don't necessarily have to do the gas
15 or shoot the -- the gun. But we always recommend the
16 new hirees (sic) -- I do -- to go through it, because
17 when they're on the unit, they may have to go through
18 the gas experience and they need to know what it's like.

19 Q. So when you say that they're not required to
20 do the gas, you mean the exercise where someone sprays
21 gas and you --

22 A. Correct.

23 Q. -- actually experience what that feels like?

24 A. Correct.

25 Q. Okay.

1 **MS. O'LEARY: I pass the witness.**

2 MR. NEWBERRY: I don't have anything
3 further.

4 (The deposition concluded at 11:06 a.m.)

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WITNESS CORRECTIONS AND SIGNATURE

Please indicate changes on this sheet of paper, giving the change, page number, line number and reason for the change. Please sign each page of changes.

PAGE/LINE	CORRECTION	REASON FOR CHANGE
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1 I, TIMOTHY CLYDE JONES, have read the
2 foregoing deposition and hereby affix my signature that
3 same is true and correct, except as noted above.

4
5 _____
6 TIMOTHY CLYDE JONES
7

8 STATE OF _____ *

9 COUNTY OF _____ *

10
11 Before me, _____, on this
12 day personally appeared TIMOTHY CLYDE JONES, known to me
13 (or proved to me under oath or through
14 _____) (description of identity card or
15 other document) to be the person whose name is
16 subscribed to the foregoing instrument and acknowledged
17 to me that they executed the same for the purposes and
18 consideration therein expressed.

19 Given under my hand and seal of office on
20 this, the _____ day of _____, 2019.

21
22 _____
23 NOTARY PUBLIC IN AND FOR THE
24 STATE OF _____
25

REPORTER'S CERTIFICATE

I, KERRIENNE L. BOND, CSR, hereby certify that this transcript is a true record of the testimony given by the witness named herein, after said witness was duly sworn by me.

I further certify that I am neither attorney nor counsel for, related to, nor employed by any of the parties to the action in which this testimony was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor do I have a financial interest in the action.

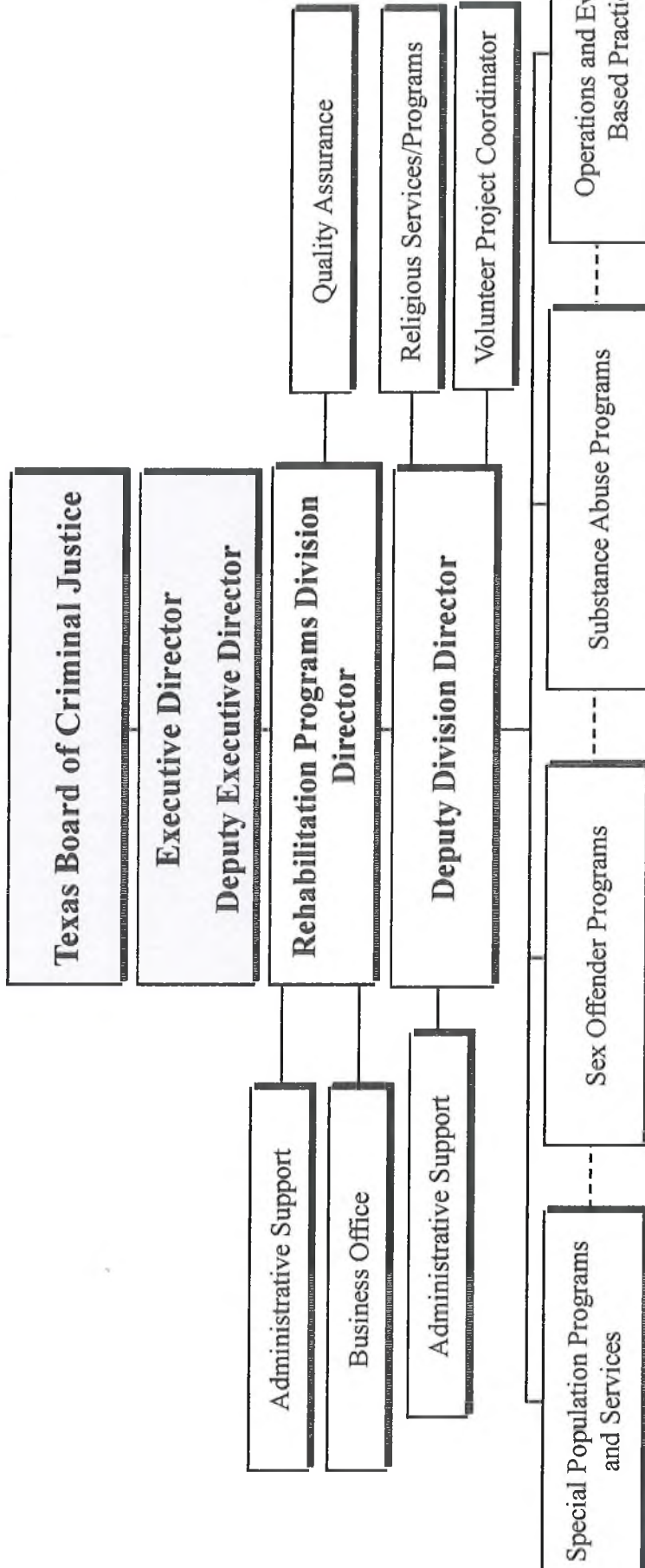
Certified to by me on July 8, 2019.



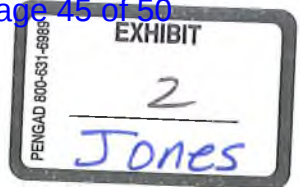
KERRIENNE L. BOND, TEXAS CSR NO. 8537
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**TEXAS DEPARTMENT OF CRIMINAL JUSTICE
ORGANIZATIONAL STRUCTURE
Rehabilitation Programs Division**



----- Coordination



AFFIDAVIT

THE STATE OF TEXAS §

COUNTY OF WALKER §

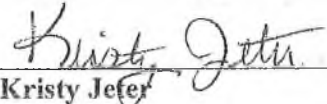
BEFORE ME, the undersigned authority, on this day personally appeared Kristy Jeter, who, being by me duly sworn, deposed as follows:

My name is Kristy Jeter and I am an employee of the Texas Department of Criminal Justice (TDCJ), a governmental agency. I am over 21 years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated.


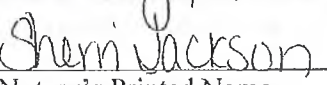
I am the Manager II for the Human Resources Division, a part of the TDCJ located in Huntsville, Texas. Attached is a true and correct copy of ~~TDCJ Chaplain 1 Job Description~~, which are kept by the TDCJ in the regular course of its business activity. The entries of such records were made as a regularly conducted activity and a regular practice of the TDCJ, and were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters.

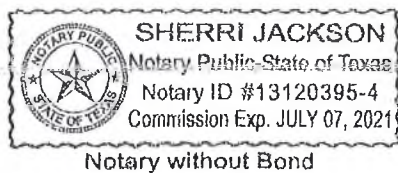
I declare under penalty of perjury that the foregoing is true and correct.

"Further Affiant sayeth not."


 Kristy Jeter
 Manager II, Support Operations
 Human Resources Division
 Texas Department of Criminal Justice

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned notary public, on the 17th day of May, 2019.


 NOTARY PUBLIC, STATE OF TEXAS

 Notary's Printed Name



My Commission Expires:
July 7, 2021

**TEXAS DEPARTMENT OF CRIMINAL JUSTICE
JOB DESCRIPTION**

POSITION TITLE: CHAPLAIN I

SALARY GROUP: B17

DEPARTMENT: Rehabilitation Programs Division

Page 1 of 3

CERTIFICATION: I certify that, to my knowledge, this is an accurate and complete description of the essential functions and the conditions required for this position.

APPROVED BY: Rene Hinojosa DATE: 12/10/2018

POSITION #: 045140

I. JOB SUMMARY

Performs routine ministerial clergy work. Work involves planning and conducting religious services and education classes; providing pastoral care and counseling to offenders and offender families; and training others. Works under moderate supervision with limited latitude for the use of initiative and independent judgment.

II. ESSENTIAL FUNCTIONS

- A. Plans, schedules, and conducts religious education worship services, programs, and sacramental ministry in accordance with the practices and customs of the chaplain's faith and according to offender faith group representation; conducts regular visits to offenders, administrative segregation housing areas, and individuals who are critically ill; and counsels offenders on religious problems, personal issues, crisis intervention, grief, and institutional adjustment.
- B. Maintains liaison with unit administration, departments, staff, and chaplaincy headquarters; and assists in providing institutional staff information on various faiths, groups, denominations, and needs of offenders.
- C. Recruits, trains, and oversees chaplaincy program volunteers; and provides agency information regarding religious educational programs, worship services, sacramental ministries, visitation, counseling programs, and other agency programs.
- D. Prepares program correspondence, statistics, and reports; and maintains required chaplaincy records, files, and other documentation.
- * Performs a variety of marginal duties not listed, to be determined and assigned as needed.

**TEXAS DEPARTMENT OF CRIMINAL JUSTICE
JOB DESCRIPTION**

POSITION TITLE: CHAPLAIN I

SALARY GROUP: B17

DEPARTMENT: Rehabilitation Programs Division

Page 2 of 3

III. MINIMUM QUALIFICATIONS

A. Education, Experience, and Training

1. Bachelor's degree from a college, university, or seminary accredited by an organization recognized by the Council for Higher Education Accreditation (CHEA) or by the United States Department of Education (USDE). Major course work in Ministry, Divinity, Religious Studies, a Behavioral Science, or a related field.

or

Graduation from an accredited senior high school or equivalent or GED. Four years full-time, wage-earning or wage-equivalent ministry experience. A minimum of 2080 volunteer hours as a Texas Department of Criminal Justice (TDCJ) Certified Volunteer Chaplaincy Assistant (CVCA), with supporting documentation (validated by the TDCJ Deputy Director of Religious Services' office), may be substituted for one year of the required experience on a year-for-year basis. Thirty semester hours from a college, university, or seminary accredited by the CHEA or by the USDE may be substituted for one year of experience on a year-for-year basis.

2. Must possess a written ecclesiastical endorsement by the applicable religious authority.

Must maintain valid ecclesiastical endorsement for continued employment in position.

B. Knowledge and Skills

1. Knowledge of religious beliefs and practices of various faiths, groups, and denominations.
2. Knowledge of professional literature and resources.
3. Knowledge of agency and departmental organizational structure, policies, procedures, rules, and regulations preferred.
4. Skill to communicate ideas and instructions clearly and concisely.
5. Skill to coordinate with other staff, departments, officials, agencies, organizations, and the public.
6. Skill in problem-solving techniques.
7. Skill in public address.
8. Skill in the use of computers and related equipment in a stand-alone or local area network environment.
9. Skill in individual and group counseling.

**TEXAS DEPARTMENT OF CRIMINAL JUSTICE
JOB DESCRIPTION**

POSITION TITLE: CHAPLAIN I

SALARY GROUP: B17

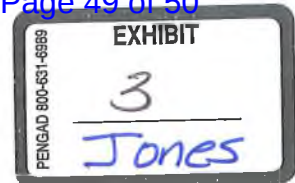
DEPARTMENT: Rehabilitation Programs Division

Page 3 of 3

10. Skill to organize, assign, and review the work of others.

IV. ADDITIONAL REQUIREMENTS WITH OR WITHOUT REASONABLE ACCOMMODATION

- A. Ability to walk, stand, sit, kneel, push, stoop, reach above the shoulder, grasp, pull, bend repeatedly, climb stairs, identify colors, hear with aid, see, write, count, read, speak, analyze, alphabetize, lift and carry under 15 lbs., perceive depth, operate a motor vehicle, and operate motor equipment.
- B. Conditions include working inside, working around machines with moving parts and moving objects, radiant and electrical energy, working closely with others, working alone, working protracted or irregular hours, and traveling by car, van, bus, and airplane.
- C. Equipment (machines, tools, devices) used in performing only the essential functions include computer and related equipment, calculator, copier, fax machine, dolly, telephone, and automobile.



1	4/9/13	Rickey Lewis	WSL	
2	4/16/13	Ronnie Threadgill	WSL	
3	4/26/13	Richard Cobb	WSL	
4	5/7/13	Carrol Parr	WSL	
5	5/15/13	Jeffery Williams	WSL	
6	6/12/13	Elroy Chester	WSL	
7	7/16/13	John Quintanilla	WSL	
8	7/18/13	Vaughn Ross	WSL	
9	7/31/13	Douglas Feldman	WSL	
10	9/19/13	Robert Garza	DH	Baptized
11	9/26/13	Arturo Diaz	DH	Baptized
12	10/9/13	Michael Yowell	DH	
13	11/12/13	Jamie McCaskey	DH/DC	
14	12/3/13	Jerry Martin	DH	Baptized
15	1/22/14	Edgar Tamayo	DH	
16	2/15/14	Susanne Basso	DH	
17	3/19/14	Ray Jasper	DH	
18	3/27/14	Anthony Doyle	DH/DC	
19	4/3/14	Tommy Sells	DH	
20	4/9/14	Ramiro Hernandez	WSL	
21	4/16/14	Jose Villegas	WSL	
22	9/10/14	Willie Trottie	DH/DC	
23	9/17/14	Lisa Coleman	DH	
24	10/28/14	Miguel Paredes	DH/WSL	
25	1/21/15	Arnold Prieto	DH	
26	1/29/15	Robert Ladd	DH/DC	
27	2/4/15	Donald Newbury	DH	
28	3/11/15	Manuel Vasquez	DH/WSL	Baptized
29	4/9/15	Kent Spouse	DH/DC	
30	4/15/15	Manuel Garza	DH/WSL	
31	5/12/15	Derrick Charles	DH/WSL	
32	6/3/15	Lester Bower	DH	
33	6/18/15	Gregory Russeau	DH/WSL	
34	8/12/15	Daniel Lopez	DH/DC	Baptized
35	10/6/15	Juan Garcia	DH/WSL	
36	10/14/15	Licho Escamilla	DH	
37	11/18/15	Raphael Holiday	DH/DC	
38	1/20/16	Richard Masterson	DH/WSL	
39	1/27/16	James Freeman	DH	
40	2/16/16	Gustavo Garcia	DH/DC	
41	3/9/16	Coy Westbrook	DH/WSL	
42	3/22/16	Adam Ward	DH	
43	4/6/16	Pablo Vasquez	DH	
44	10/5/16	Barney Fuller	DH	
45	1/11/17	Christopher Wilkins	DH/DC	
46	1/26/17	Terry Edwards	DH	

47	3/7/17	Rolando Ruiz	DH/DC	
48	3/14/17	James Bigby	DH	
49	7/27/17	Taichin Preyor	DH/DC	
50	10/12/17	Robert Pruett	DH	
51	11/8/17	Ruben Cardenas	DH/DC	
52	1/18/18	Anthony Shore	DH	
53	1/30/18	William Rayford	DH/DC	
54	2/1/18	John Battaglia	DH	
55	3/27/18	Rosendo Rodriquez	DH/DC	
56	4/25/18	Erick Davila	DH	
57	5/16/18	Juan Castillo	DH/DC	
58	6/27/18	Danny Bible	DH	
59	7/17/18	Christopher Young	DH/DC	
60	9/26/18	Troy Clark	DH/DC	
61	9/27/18	Daniel Acker	DH	
62	11/14/18	Robert Ramos	DH/DC	
63	12/4/18	Joseph Garcia	DH	
64	12/11/18	Alvin Braziel	DH/DC	
65	1/30/19	Robert Jennings	DH	
66	2/28/19	Billie Coble	DH	